

1888-022 Chancery Causes: John Greer vs. Sallie Greer  
Lee Co.

Anderson, Fletcher

CA-Divorce  
T-Vices

To the Hon. John A. Kelly Judge of the Circuit  
Court of Lee County Virginia.

Your Orator John Greer humbly complain-  
ing, would respectfully show, that on or  
about the 1st day of January 1870, he mar-  
ied his present wife, Sallie Greer, and  
they lived together as man and wife until  
in March 1885; when she became untrue  
and would not stay at home, and he  
became satisfied that she was guilty of  
acts of adultery, and they separated, and  
he has not lived or cohabited with her  
since, and he is satisfied and therefore  
charges that his said wife has been guilty  
of frequent acts of adultery since their separa-  
-tion, <sup>as well as before</sup>. The object of this bill is therefore to pro-  
-cure a divorce from the bonds of matrimony  
now existing between your orator and his  
said wife, and to effect this ~~and~~ he prays  
that the said Sallie Greer be made a party  
defendant to this bill and answer its allega-  
-tions on oath, and that upon a hearing a  
decree to this end be rendered in favor of  
your orator, And for all other further and  
general relief. May I pray issue &c.

Richmond & Orr, for  
Complainant.



6/15 - to Nov. 1887  
 2.50  
 15.00  
 \$23.65

John Greer.

vs } Bill in Chancery

Ballie Greer.

1885 Octo, Bill filed Spa  
 Exd & D. Crissi

" Nov. D. N. Gifford decr. Cont'd

1886. Jan'y & Feby Cont'd

" March Cause set for hearing

" Aug & Sept Cont'd

1887. continued

1888 Mr. & Aug Cont'd

" decr. decree final

90 to 00

g-

D. J. Douglas.



To Sally Greer

You will please take notice that on the 11<sup>th</sup> day of Aug. 1886 at Campbells store Lee Co. Va. I will proceed to take the depositions of Jack Anderson and A.R. Fletcher and others which depositions when taken are intended to be read as evidence in my behalf a certain suit in chancery now pending in circuit court of said county in which I am plaintiff and you are defendant and if from any cause the taking of said depositions are not completed on that day the taking of the same if necessary will be adjourned from time and from place to place until completed Given under my hand this 11<sup>th</sup> day of August 1886.

John <sup>his</sup> ~~X~~ Greer  
mark

by order of his council



Bergman Lee consent to wit

This day personally before me George H. Beverly  
and made oath that he had served a true  
copy of the within notice upon Sally Green on  
the 11<sup>th</sup> day of August 1846

Lee S. Fuller, J.P.



John Greer      Puff  
 do      } In divorce  
 Sally Greer      Deft

The depositions of John B. Anderson and A. R. Fletcher  
 Peter W. Paffenbarger taken pursuant to notice herewith  
 returned on the 11<sup>th</sup> day of August 1886 at Campbells store  
 in Lee County Virginia which is intended to be read  
 as evidence on the part of the plaintiff in the above  
 styled  
 "Cause now pending in the circuit of Lee County upon  
 the trial thereof

The said John B. Anderson A. R. Fletcher  
 and Peter W. Paffenbarger witnesses of lawful age being duly  
 sworn depose and say

1. in answer to question by plaintiff, Mrs. Anderson do you know  
 whether or not Sally Greer plaintiff in this cause has  
 had sexual intercourse with any person except  
 myself,

Answer I do know she has had intercourse  
 with another aside from John Greer plaintiff in  
 this cause further this deponent says to wit

John B. Anderson

The further taking of said  
 depositions was postponed until on Monday the 16<sup>th</sup> day of August  
 1886

Lee S. Fullkrom

met according to appointment and adjourned  
 to meet at Lee S. Fullkroms Residence on Friday the 20<sup>th</sup>  
 of August 1886

met according to previous appointment on the 20<sup>th</sup>  
 day of August 1886 Plaintiff present and



now A. R. Fletcher being present was duly sworn  
and deposed as follows

Question, 1<sup>st</sup> by Plaintiff Mr Fletcher do you know  
whether Sally Green plaintiff in this case has  
had ~~several~~ <sup>any</sup> ~~interviews~~ <sup>interviews</sup> with anyone <sup>or</sup> <sup>my</sup>  
self

Answer I do know that Sally Green is guilty of  
the act here charged further, this defendant  
says the not,  
A. R. Fletcher

Virginia Lee County to wit

I Lee S Fulkerson a justice of the peace in &  
for the county and state of Iowa do certify that  
the foregoing depositions of J B Anderson & A R  
Fletcher was taken before sworn to and subscribed  
by them in my presence, at the time and place  
and for the purposes in the caption mentioned

Given under my hand and  
this the 21<sup>st</sup> day of August 1886  
Lee S Fulkerson, J. P.

Costs for taking said depositions and  
notices written for plaintiff \$2.50  
Lee S Fulkerson, J. P.



John Greer  
vs } Depo  
Sally Greer

Filed Aug. 23/1886  
J. A. Hyattce

J. P. fee \$2.50



# The Commonwealth of Virginia,

To the Sheriff of Lee County--Greeting:

WE COMMAND YOU to summon

*Sallie Green*

to appear at the Clerk's office of the Circuit Court of Lee County, at the Court House, on the first Monday in

*Oct. 1885* next, being Rule Day, to answer a Bill in Chancery exhibited in our Court against

*her*, by *John Green*

And have then and there this Writ. Witness, J. A. G. HYATT, Clerk of our said Court, at the Court House,  
this *2nd* day of *Oct.*, 188*5*, in the *10th* year of the Commonwealth.

*J. A. G. Hyatt*, Clerk.

A Copy---Teste:



Virginia Lee county to wit:

I, Lee S Fulkerson Justice of the peace  
for Lee County do certify that Stephen Hales  
this day personally appeared before me in  
my county aforesaid and made oath that  
he delivered a true copy of the within Sp. to  
Sallie Greer on the 3<sup>rd</sup> of Oct 1888.  
Given under my hand this Oct 3<sup>rd</sup> 1888

Lee S Fulkerson J.P.

(R & O)

John Greer

Sp. in Chg

Sallie Greer.

Oct Hales 1888.